

Ryan P. Poscablo  
+1 212 506 3921 direct  
rposcablo@steptoe.com

**Steptoe**

1114 Avenue of the Americas  
New York, NY 10036-7703  
212 506 3900 main  
www.steptoec.com

January 26, 2023

**Via ECF and E-Mail**

Hon. Andrew L. Carter  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Barend Oberholzer*, 1:21-cr-00475-ALC**

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request that the Court modify Mr. Oberholzer's bail conditions to allow future travel to meet with his attorneys in Washington, D.C. where undersigned counsel's law firm has an office.

Pretrial Services, by PTSO Dominique Jackson, takes no position on Mr. Oberholzer's application. The government, by AUSA Jilan Kamal, has no objection to Mr. Oberholzer's application. By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500K personal recognizance bond secured by two financially responsible persons, with conditions including, inter alia, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release.

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Ryan P. Poscablo

Ryan P. Poscablo, Esq.

cc: Jilan Kamal, Esq., Assistant United States Attorney (by ECF)  
Dominique Jackson, Pretrial Services (by email)

So Ordered:

---

Hon. Andrew L. Carter, Jr.